

John Auld
Jayco, Inc.
903 South Main Street
Middlebury, Indiana 46540

Re: MSM 039-12099-00265
Minor Source Modification to:
Part 70 Permit No.: **T 039-5080-00265**

Dear Mr. Auld:

Jayco, Inc. was issued Part 70 operating permit **T 039-5080-00265** on June 30, 1999 for a recreational vehicle assembly source. An application to modify the source was received on March 28, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission unit is approved for construction at the source:

One (1) recreational vehicle assembly line, known as EU L-51, to be installed in 2000, exhausting inside the building, consisting of: adhesive, solvent wiping, caulking and touch-up paint operations, capacity: 4 recreational vehicles per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Frank P. Castelli, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
FPC/MES

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
North Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Jayco, Inc.
903 South Main Street
Middlebury, Indiana 46540**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-5080-00265	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 30, 1999

First Minor Source Modification, MSM 039-11383-00265, issued December 3, 1999

Second Minor Source Modification: MSM 039-12099-00265	Pages Affected: 4, 4a, 6, 30, 31, 35, 41a, 41b, 41c and 46a-d
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

D.2 FACILITY CONDITIONS - Spray Booths (EU SB-6 and SB-7), Proposed

General Construction Conditions

Effective Date of the Permit

First Time Operation Permit

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

D.2.7 Particulate Matter (PM) [326 IAC 6-3-2(c)]

D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.2.9 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.2.10 Volatile Organic Compounds (VOC)

D.2.11 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.12 Particulate Matter (PM)

D.2.13 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.14 Record Keeping Requirements

D.2.15 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS - Woodworking Operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.3.4 Particulate Matter (PM)

D.4 FACILITY OPERATION CONDITIONS - Insignificant Activities

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC)

D.4.2 Particulate Matter (PM) [326 IAC 6-3]

Compliance Determination Requirement

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.5 FACILITY CONDITIONS - Assembly Line, EU L-51

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

D.5.3 HAPs Limitations [326 IAC 2-4.1-1]

D.5.4 Particulate Matter (PM) [326 IAC 6-3-2]

Compliance Determination Requirement

D.5.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

D.5.6 VOC and HAPs Emissions

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.7 Record Keeping Requirements

D.5.8 Reporting Requirements

Certification Form

Emergency/Deviation Occurrence Report

Monthly Report Forms

Quarterly Report Forms

Quarterly Compliance Monitoring Form

- (g) One (1) woodworking operation, known as EU W-16, installed in 1973, exhausted to vent W-16, consisting of various saws, routers, and milling equipment, equipped with one (1) baghouse, known as CE-16, exhausted to vent W-16, equipped with one (1) cyclone, known as CE-21, exhausted to P21-1, capacity: 1,100 pounds of wood per hour.
- (h) One (1) lamination operation, known as lamination, installed in 1973, exhausted internally, maximum capacity to support assembly line production.
- (i) One (1) metal and wood spray booth, known as EU SB-2, installed in 1973, exhausted to vents P4-1 and P4-2, using air assisted, airless, and conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (j) One (1) wood component spray booth, known as EU SB-3, installed in 1973, exhausted to vent P4-3, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (k) One (1) wood component dip tank, known as EU DB-4, installed in 1973, exhausted to vent P4-4, maximum capacity to support assembly line production.
- (l) One (1) adhesive on wood application area, known as EU SB-5, installed in 1976, exhausted to vent P8-1, using air atomized spray equipment, maximum capacity to support assembly line production.
- (m) One (1) recreation vehicle assembly line, known as EU L-6, installed in 1987, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (n) One (1) wood component spray booth, known as EU SB-1, installed in 1992, exhausted to vent P16-1, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (o) One (1) repair spray booth known as SB-6, to be installed in 1998, exhausted to vent P10-1, equipped with dry filter control, maximum capacity to support assembly line production.
- (p) One (1) repair spray booth, known as SB-7, to be installed in 1998, exhausted to P41-1, equipped with dry filter control, maximum capacity to support assembly line production.
- (q) One (1) recreational vehicle assembly line, known as EU L-51, to be installed in 2000, exhausting inside the building, consisting of: adhesive, solvent wiping, caulking and touch-up paint operations, capacity: 4 recreational vehicles per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The following is descriptive information and does not constitute an enforceable condition; however, the Permittee should be aware that physical changes or changes in the method of operation that may render this descriptive information obsolete or inaccurate may also trigger requirements for permits or permit modifications under 326 IAC 2.

- (a) One (1) recreation vehicle assembly line, known as EU L-1, installed in 1973, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 10 RVs per hour.
- (b) One (1) recreation vehicle assembly line, known as EU L-4, installed in 1974, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (c) One (1) recreation vehicle assembly line, known as EU L-5, installed in 1974, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (d) One (1) recreation vehicle assembly line, known as EU L-22, installed in 1973, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (e) One (1) recreation vehicle assembly line, known as EU L-23, installed in 1974, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (f) One (1) recreation vehicle assembly line, known as EU L-8, installed in 1976 exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (h) One (1) lamination operation, known as lamination, installed in 1973, exhausted internally, maximum capacity to support assembly line production.
- (i) One (1) metal and wood spray booth, known as EU SB-2, installed in 1973, exhausted to vents P4-1 and P4-2, using air assisted, airless, and conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (j) One (1) wood component spray booth, known as EU SB-3, installed in 1973, exhausted to vent P4-3, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (k) One (1) wood component dip tank, known as EU DB-4, installed in 1973, exhausted to vent P4-4, maximum capacity to support assembly line production.
- (l) One (1) adhesive on wood application area, known as EU SB-5, installed in 1976, exhausted to vent P8-1, using air atomized spray equipment, maximum capacity to support assembly line production.
- (m) One (1) recreation vehicle assembly line, known as EU L-6, installed in 1987, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (n) One (1) wood component spray booth, known as EU SB-1, installed in 1992, exhausted to vent P16-1, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of coating delivered to the applicators at EU SB-2 shall be limited to three and a half (3.5) pounds of VOC per gallon of coating less water on a daily volumetrically weighted basis on all days when total VOC emissions from this spray booth exceed fifteen (15.0) pounds, for forced warm air or air dried coatings.

- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The VOC delivered to the applicators of the vehicle assembly line EU L-6 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification which may increase actual VOC usage to twenty-five (25) tons per year or more from the vehicle assembly line EU L-6 will make the facilities subject to 326 IAC 8-1-6.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The PM from the seven (7) assembly lines (EU L-1, L-4, L-5, L-6, L-8, L-22, & L-23) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate for one hundred (100) up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) The PM from the four (4) spray booths, one (1) dip booth and one (1) lamination booth (EU SB-1, SB-2, SB-3, DB-4, SB-5 & Lamination) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

SECTION D.2

FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The following is descriptive information and does not constitute an enforceable condition; however, the Permittee should be aware that physical changes or changes in the method of operation that may render this descriptive information obsolete or inaccurate may also trigger requirements for permits or permit modifications under 326 IAC 2.

- (o) One (1) repair spray booth known as SB-6, to be installed in 1998, exhausted to vent P10-1, equipped with dry filter control, maximum capacity to support assembly line production.
- (p) One (1) repair spray booth, known as SB-7, to be installed in 1998, exhausted to P41-1, equipped with dry filter control, maximum capacity to support assembly line production.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

- D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.2.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM, may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.
- D.2.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

- D.2.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (q) One (1) recreational vehicle assembly line, known as EU L-51, to be installed in 2000, exhausting inside the building, consisting of: adhesive, solvent wiping, caulking and touch-up paint operations, capacity: 4 recreational vehicles per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The VOC delivered to the applicators of the recreational vehicle assembly line, EU L-51, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification which may increase actual VOC usage to twenty-five (25) tons per year or more from the recreational vehicle assembly line, EU L-51, will make the line subject to 326 IAC 8-1-6.

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

To avoid the applicability of 326 IAC 8-2-9, the volatile organic compounds (VOC) delivered to the applicators for coating metal parts in assembly line, EU L-51, shall be limited to less than fifteen (15) pounds per day.

D.5.3 HAPs Limitations [326 IAC 2-4.1-1]

- (a) The worst case single HAP delivered to the applicators in recreational vehicle assembly line, EU L-51, shall be less than ten (10) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.
- (b) The combination of HAPs delivered to the coating applicators in recreational vehicle assembly line, EU L-51, shall be less than a total of twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

D.5.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the assembly line, EU L-51, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.5.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC usage limitations contained in Conditions D.5.1 and D.5.2 as well as the HAPs usage limitations contained in Condition D.5.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.5.6 VOC and HAPs Emissions

- (a) Compliance with Conditions D.5.1 and D.5.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compounds, worst case single HAP and combination of HAPs usage for the most recent month and twelve (12) month period.
- (b) Compliance with Condition D.5.2 shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage for the most recent day.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1 and D.5.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.5.1 and D.5.3.
 - (1) The amount and VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the months of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAPs usage for each month; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.5.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.5.2.
 - (1) The amount and VOC content of each coating material used to coat metal parts. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
 - (3) The total VOC usage for each day; and
 - (4) The weight of VOCs emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.5.1, D.5.2 and D.5.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU L-51
Parameter: Volatile Organic Compounds
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU L-51
Parameter: Single HAP Delivered to the Applicators
Limit: Less than Ten (10) tons per twelve (12) consecutive month period

YEAR: _____

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU L-51
Parameter: Combination of HAPs Delivered to the Applicators
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

YEAR: _____

Month	Combination of HAPs (tons)	Combination of HAPs (tons)	Combination of HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Monthly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU L-51
Parameter: Volatile Organic Compounds
Limit: Less than 15 pounds per day

Month: _____ Year: _____

Day	EU L-51	Day	EU L-51
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Minor Source Modification

Source Background and Description

Source Name:	Jayco, Inc.
Source Location:	903 South Main Street, Middlebury, Indiana 46540
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	T 039-5080-00265
Operation Permit Issuance Date:	June 30, 1999
Minor Source Modification No.:	039-12099-00265
Permit Reviewer:	Frank P. Castelli

The Office of Air Management (OAM) has reviewed a modification application from Jayco Inc. relating to the construction of the following emission units and pollution control devices:

One (1) recreational vehicle assembly line, known as EU L-51, to be installed in 2000, exhausting inside the building, consisting of: adhesive, solvent wiping, caulking and touch-up paint operations, capacity: 4 recreational vehicles per hour.

History

On March 28, 2000 Jayco, Inc. submitted an application to the OAM requesting to add an assembly line and a mill room to their existing source. Jayco, Inc. was issued a Part 70 Operating Permit on June 30, 1999 for a recreational vehicle assembly source. The first minor source modification was issued for the addition of assembly line, known as L-2, on December 3, 1999.

The proposed woodworking mill room would have made this modification significant pursuant to 326 IAC 2-7-10.5(f)(4), but the response to the Notice of Deficiency No. 1, received on April 12, 2000, indicated that the proposed mill room was withdrawn from this modification. Therefore, this modification is now considered a minor source modification pursuant to 326 IAC 2-7-10.5(d)(4).

In addition, assembly line, known as L-3, was removed from this source and relocated to the Jacyo north plant at 10758 County Road 2 in Middlebury by the Registration 039-11317-00528. Therefore, all references to the L-3 assembly line have been proposed to be deleted from the Part 70 Operating Permit.

Source Definition

This recreational vehicle company consists of two (2) plants located in Middlebury.

- (a) Plant 1 (Middlebury Plant) is located at 903 South Main Street in Middlebury; and
- (b) Plant 2 (North Plant) is located at 10758 County Road 2 in Middlebury.

The plants are under common control. The plants have the same SIC code. The plants are not contiguous or adjacent. They are located eight (8) miles apart from each other. The plants will operate as separate producers of different recreational vehicle lines. There will be a minimal exchange of material between the two (2) plants, possibly ten percent (10%). Therefore, the Middlebury and the North plants have been and will continue to be treated as separate sources.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 28, 2000. Additional information was received on April 12, 2000.

Emission Calculations

See page 1 of 1 of Appendix A of this document for detailed emissions calculations.

Potential To Emit Of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM ₁₀	0.00
SO ₂	0.00
VOC	73.9
CO	0.00
NO _x	0.00

HAPs	Potential To Emit (tons/year)
Toluene	15.1
Ethylbenzene	0.699
MEK	0.611
MIBK	0.021
Hexane	23.1
TOTAL	39.6

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5).

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	9.81
PM ₁₀	9.81
SO ₂	3.00
VOC	209.5
CO	2.00
NO _x	4.00

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Document (TSD) for the First Minor Source Modification, 039-11383 which already included the minor source modification limit VOC increase of twenty-four (24) tons per year on page 3 of 6 in the Source Status table.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units, in the proposed modification, after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Proposed Modification	Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Assembly Line EU L-51	0.00	0.00	0.00	<25	0.00	0.00	<10 single and <25 combination
PSD Threshold Level	250	250	250	250	250	250	-

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60 applicable to this source.
- (b) This source is still not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart JJ, since the source does not manufacture any products in the SIC codes listed in the definition of wood furniture. The wood components manufactured at this source are structural and are not considered furniture.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New source toxics control)

The HAPs emissions from the proposed assembly line shall be limited to less than the major source levels of ten (10) tons per year for a single HAP and twenty five (25) tons per year for the combination of HAPs. Therefore, this rule is not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of volatile organic compounds in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-3-2 (Process Operations)

- (a) The spray operations to be conducted in the proposed assembly line, EU L-51, shall comply with the requirements of 326 IAC 6-3-2(c). The 326 IAC 6-3-2 equations are as follows: $E = 4.10 P^{0.67}$, where P equals process weight in tons per hour for process weights up to and including sixty thousand (60,000) pounds per hour and E equals the allowable emission rate in pounds per hour.

For process weights in excess of sixty thousand (60,000) pounds per hour, the following equation is used: $E = 55.0 P^{0.11} - 40$. Compliance for the spray operation will be obtained by the use of dry filters for overspray control.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The VOC emissions from the coating of metal substrates on the proposed assembly line EU L-51 will be limited to less than fifteen (15) pounds per day. Therefore, the requirements of this rule will not apply to the metal surface coating operations performed in this assembly line.

326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating)

This rule does not apply to the operations at this source since the rule applies to sources that manufacture wood furnishings and this source does not manufacture wood furnishings.

326 IAC 8-1-6 (Best Available Control Technology)

The proposed assembly line, known as EU L-51, to be constructed after January 1, 1980 with potential VOC emissions greater than twenty-five (25) tons per year is potentially subject to the requirements of 326 IAC 8-1-6. The source has agreed to limit VOC emissions from this assembly line to less than twenty-five (25) tons per year and therefore, this rule does not apply.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

The proposed recreational vehicle assembly line, known as EU L-51, has applicable compliance monitoring conditions as specified below:

- (a) The amount of VOC, any single HAP delivered to the applicators in the assembly operations, and the amount of any combination of HAPs delivered to the applicators including cleanup solvents must be monitored and recorded on a monthly basis for the proposed assembly line.
- (b) The amount of VOC delivered to the applicators when coating metal in the assembly operations must be monitored and recorded on a daily basis for the proposed assembly line.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (m) ~~One (1) recreation vehicle assembly line, known as EU L-3, installed in 1989, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.~~

- (mn) One (1) recreation vehicle assembly line, known as EU L-6, installed in 1987, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (ne) One (1) wood component spray booth, known as EU SB-1, installed in 1992, exhausted to vent P16-1, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (op) One (1) repair spray booth known as SB-6, to be installed in 1998, exhausted to vent P10-1, equipped with dry filter control, maximum capacity to support assembly line production.
- (pq) One (1) repair spray booth, known as SB-7, to be installed in 1998, exhausted to P41-1, equipped with dry filter control, maximum capacity to support assembly line production.
- (q) **One (1) recreational vehicle assembly line, known as EU L-51, to be installed in 2000, exhausting inside the building, consisting of: adhesive, solvent wiping, caulking and touch-up paint operations, capacity: 4 recreational vehicles per hour.**

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The following is descriptive information and does not constitute an enforceable condition; however, the Permittee should be aware that physical changes or changes in the method of operation that may render this descriptive information obsolete or inaccurate may also trigger requirements for permits or permit modifications under 326 IAC 2.

- ~~(m) One (1) recreation vehicle assembly line, known as EU L-3, installed in 1989, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.~~
- (mn) One (1) recreation vehicle assembly line, known as EU L-6, installed in 1987, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (ne) One (1) wood component spray booth, known as EU SB-1, installed in 1992, exhausted to vent P16-1, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The PM from the **seven (7)** ~~eight (8)~~ assembly lines (EU L-1, ~~L-3~~, L-4, L-5, L-6, L-8, L-22, & L-23) shall not exceed the pound per hour emission rate established as E in the following formula:

SECTION D.2

FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The following is descriptive information and does not constitute an enforceable condition; however, the Permittee should be aware that physical changes or changes in the method of operation that may render this descriptive information obsolete or inaccurate may also trigger requirements for permits or permit modifications under 326 IAC 2.

- (op) One (1) repair spray booth known as SB-6, to be installed in 1998, exhausted to vent P10-1, equipped with dry filter control, maximum capacity to support assembly line production.
- (pq) One (1) repair spray booth, known as SB-7, to be installed in 1998, exhausted to P41-1, equipped with dry filter control, maximum capacity to support assembly line production.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (q) One (1) recreational vehicle assembly line, known as EU L-51, to be installed in 2000, exhausting inside the building, consisting of: adhesive, solvent wiping, caulking and touch-up paint operations, capacity: 4 recreational vehicles per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The VOC delivered to the applicators of the recreational vehicle assembly line, EU L-51, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification which may increase actual VOC usage to twenty-five (25) tons per year or more from the recreational vehicle assembly line, EU L-51, will make the line subject to 326 IAC 8-1-6.

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

To avoid the applicability of 326 IAC 8-2-9, the volatile organic compounds (VOC) delivered to the applicators for coating metal parts in assembly line, EU L-51, shall be limited to less than fifteen (15) pounds per day.

D.5.3 HAPs Limitations [326 IAC 2-4.1-1]

- (a) The worst case single HAP delivered to the applicators in recreational vehicle assembly line, EU L-51, shall be less than ten (10) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.
- (b) The combination of HAPs delivered to the coating applicators in recreational vehicle assembly line, EU L-51, shall be less than a total of twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

D.5.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the assembly line, EU L-51, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.5.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC usage limitations contained in Conditions D.5.1 and D.5.2 as well as the HAPs usage limitations contained in Condition D.5.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.5.6 VOC and HAPs Emissions

- (a) Compliance with Conditions D.5.1 and D.5.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compounds, worst case single HAP and combination of HAPs usage for the most recent month and twelve (12) month period.
- (b) Compliance with Condition D.5.2 shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage for the most recent day.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1 and D.5.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.5.1 and D.5.3.
 - (1) The amount and VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the months of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAPs usage for each month; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.5.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.5.2.
 - (1) The amount and VOC content of each coating material used to coat metal parts. Records shall include purchase orders, invoices, and material safety

data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;**
 - (3) The total VOC usage for each day; and**
 - (4) The weight of VOCs emitted for each compliance period.**
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

D.5.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.5.1, D.5.2 and D.5.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU L-51
Parameter: Volatile Organic Compounds
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 **No deviation occurred in this quarter.**
- 9 **Deviation/s occurred in this quarter.**
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU L-51
Parameter: Single HAP Delivered to the Applicators
Limit: Less than Ten (10) tons per twelve (12) consecutive month period

YEAR: _____

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU L-51
Parameter: Combination of HAPs Delivered to the Applicators
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

YEAR: _____

Month	Combination of HAPs (tons)	Combination of HAPs (tons)	Combination of HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Monthly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU L-51
Parameter: Volatile Organic Compounds
Limit: Less than 15 pounds per day

Month: _____ **Year:** _____

Day	EU L-51	Day	EU L-51
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 039-12099-00265.

Appendix A: Potential Emissions Calculations
VOC and HAPS
From Surface Coating Operations

Company Name: Jayco, Inc.

Address City IN Zip: 903 Main Street, Middlebury, IN 46540

Source Modification No.: 039-12099

Plt ID: 039-00265

Reviewer: Frank P. Castelli

Date: March 28, 2000

Actual 1997 Emission Based on 2080 Hours of Operation (tons per y ear)

	L-51				
Toluene	3.592				
Ethylbenzene	0.166				
Xylene	0.000				
MEK	0.145				
MIBK	0.005				
Hexane	5.495				
Methylene Chloride	0.000				
1,1,1 Trichloroethane	0.000				
Total HAPs	9.403				
VOC	17.558				

Potential Emissions Based on 8760 Hours of Operation (tons per y ear)

Toluene	15.128				
Ethylbenzene	0.699				
Xylene	0.000				
MEK	0.611				
MIBK	0.021				
Hexane	23.142				
Methylene Chloride	0.000				
1,1,1 Trichloroethane	0.000				
Total HAPs	39.601				
VOC	73.946				
Limited Emissions	VOC <25	Single HAP <10 and Combination HAPs < 25			